

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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**JOSEPH FIERRO,**

Docket #: 07-CV-11214  
(SAS)

Plaintiff,

-against-

**THE CITY OF NEW YORK, THE NEW YORK CITY DEPARTMENT OF EDUCATION, RONNA BLEADON**, former Principal, P12X, Special Education District 75, New York City Department of Education, in her individual and official capacities, **SHARON BURNETT**, former Local Instructional Superintendent within Special Education District 75, New York City Department of Education, in her individual and official capacities, **DR. SUSAN ERBER**, former Superintendent, Special Education District 75, Citywide Programs, New York City Department of Education, in her individual and official capacities, and **BONNIE BROWN**, former Deputy Superintendent (and current Superintendent), Special Education District 75, Citywide Programs, New York City Department of Education, in her individual and official capacities,

**NOTICE OF  
CROSS-MOTION**

Defendants.  
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**PLEASE TAKE NOTICE** that, upon the annexed Affirmation of Anthony C. Ofodile, Esq., dated June 10, 2008, and the exhibits annexed thereto, the accompanying Memorandum of Law, and all prior pleadings and proceedings, Plaintiff will cross-move this Court, before the Honorable Shira A. Sheindlin, United States District Judge, Southern District of New York, on a date and time to be designated by the Court, for an order pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, granting Plaintiff leave to amend the Complaint on the ground that the proposed amendments are not made in bad faith and do not prejudice the Defendants.

Dated: Brooklyn, New York  
June 10, 2008

OFODILE & ASSOCIATES, P.C.  
Attorneys for Plaintiff Joseph Fierro

By: /s/ /b/ Anthony C. Ofodile, Esq.  
Anthony Ofodile, Esq. (AO-8295)  
Kathy A. Polias, Esq. (KP-9025)  
498 Atlantic Avenue  
Brooklyn, New York 11217  
(718) 852-8300

To: Kami Z. Barker, Esq.  
Assistant Corporation Counsel  
The City of New York Law Department  
100 Church Street  
New York, NY 10007